

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Mail Processing Network
Rationalization Service Changes, 2012

Docket No. N2012-1

PUBLIC REPRESENTATIVE'S THIRD SET
OF INTERROGATORIES AND REQUESTS FOR PRODUCTION TO
UNITED STATES POSTAL SERVICE WITNESS NERI (PR/USPS-T-4: 11-14)

(February 23, 2012)

Pursuant to 39 CFR 3001.25 through 3001.28, the Public Representative hereby submits the following interrogatories and requests for production of documents. Definitions and instructions included with the Public Representative's First Set of Interrogatories and Requests for Production to United States Postal Service, PR/USPS-1-3 dated December 21, 2011, are hereby incorporated by reference.

The Public Representative encourages the Postal Service to discuss issues of burden, privilege, relevance, or question clarity informally to obviate the need for objections or motions practice.

Respectfully Submitted,

/s/ Christopher J. Laver

Public Representative for
Docket No. N2012-1

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PR/USPS-T-4-11

Please refer to page 24 of your testimony where you state: "Currently, approximately 252 mail processing facilities are being studied for potential consolidation and/or closure". Please explain how these 252 facilities were selected and provide the details of the analysis made prior the selection, if applicable.

PR/USPS-T-4-12

Please refer to page 27 of your testimony where you state: "As processing windows are expanded and the workload is balanced across the mail processing day, the Postal Service would be able to manage processing operations effectively, match workhours to workload, and plan for peak load issues."

- a. Please provide the details of the Postal Service's plan to deal with peak load issues, or alternatively, indicate that such a plan does not exist.
- b. Please indicate the specific months, days, or tours the Postal Service identifies as being at risk of encountering peak load problems?
- c. Please identify those facilities by facility number and, if applicable, months, days, or tours the Postal Service identifies as potentially encountering peak load problems.

PR/USPS-T-4-13

Please refer to your response to PR/USPS-4-4 (b) where you state: "g. SumOfDown Time – This is the number of hours that the machines (by type in column B) were down...". Please also refer to LR-USPS-N2012-1/44, Materials Responsive to PR USPS-T4-1(b), LR44(Neri).xls, worksheet 'Data'.

- a. Please explain what a negative value for SumOfDown Time means? For example, 'SumOfDown Time on October 31, 2010 for AFCS was '-0.4886' (see, column G, line 29 of worksheet 'Data').
- b. Please refer to worksheet 'Data' and note that there is no data for APBS for the months of October 2010, February 2011 and March 2011. Please explain if/why APBS was not running during those months, or, if the data was unintentionally omitted, please provide it.

PR/USPS-T-4-14

Please refer to your response to GCA/USPS-T4-2 where you state: “the 487 figure referenced in the testimony was the count of network facilities as of September 15, 2011. The list of facilities...appear in Library Reference USPS-LR-N2012-1/57.” Please also refer to LR-USPS-N2012-1/10, Materials in Support of T-4, file FY2010_EOR_RunDownIdle Time Lib Ref and your response to POIR 1, question 22 a. where you state: “The file, FY2010_EOR_RunDownIdle Time.xls was created by extracting raw Fiscal Year 2010 end of Run (EOR) Data for all EOR facilities (see list in column B), for all equipment at these sites, for all runs”.

- a. Please provide definition for End of Run (EOR) facilities listed in USPS-LR-N2012-1/10.
- b. Please explain how EOR facilities listed in USPS-N2012-1/10 correspond to network facilities listed in USPS-LR-N2012-1/57.
- c. Please confirm that 892 EOR sites listed in USPS-N2012-1/10 include all 487 network facilities listed in USPS-LR-N2012-1/57.
 - i. If confirmed, please provide the description of other EOR sites included in USPS-N2012-1/10, but not included in USPS-LR-N2012-1/57.
 - ii. If not confirmed, please explain what facilities listed in USPS-N2012-1/57 are not listed in USPS-LR-N2012-1/10, and the rationale.